

EXHIBIT 15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)

This document relates to:

Federal Insurance Co. v. Al Qaida, Case No. 03-cv-06978

Thomas E. Burnett, Sr. v. Al Baraka Inv. & Dev. Corp., Case No. 03-cv-09849

Estate of John P. O'Neill, Sr. v. Al Baraka Inv. & Dev. Corp., Case No. 04-cv-01923

Continental Casualty Co. v. Al Qaeda, Case No. 04-cv-05970

Cantor Fitzgerald & Co. v. Akida Bank Private Ltd., Case No. 04-cv-07065

Euro Brokers Inc. v. Al Baraka Inv. & Dev. Corp., Case No. 04-cv-07279

DECLARATION OF YAHYA SAEED AHMAD LOOTAH

I, Yahya Saeed Ahmad Lootah, declare that I am over the age of eighteen years and of sound mind to make this declaration. I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify to the statements and facts contained herein, all of which are true and accurate to the best of my knowledge and belief:

Background

1. My father is Saeed Ahmad Lootah. In 1975, he founded Dubai Islamic Bank ("DIB") in the United Arab Emirates ("UAE").
2. Throughout my career beginning in 1989, I worked closely with my father to run the businesses that he founded.
3. I have served as the Vice Chairman and CEO of S.S. Lootah Group since 2002. I have served on DIB's Board of Directors since 2011. I currently serve as the Board Advisor of the Dubai Chamber of Commerce and Industry since 2001, a public non-profit organization that works to support the business community in Dubai. I have been a member on the Board of Dubai Chamber of Commerce and Industry since 2012.

4. I obtained my undergraduate degree in civil engineering from Islamic School for Training & Education in 1989. I later completed a Master of Science in Engineering from the University of Bridgeport in Connecticut in 1996.

5. I have never supported terrorism of any kind and strongly oppose all forms of violence.

Family

6. I married my wife in 1998, and we have five children.

7. Until I was married in 1998, I lived with my father in our family home in Dubai (with the exception of approximately two years while I was studying). During this time, I saw my father on almost a daily basis. During my studies at the University of Bridgeport, I would come back to Dubai during breaks and regularly keep in touch with my father by telephone on a weekly basis. Following my marriage in 1998, I moved into my own house next to my father's house in the same residential development (in an area called Muhaisnah) and continued to see my father on almost a daily basis. I continued to have daily contact with my father regarding both business and personal family affairs. We remained in close contact until his death in June of 2020.

8. My father's house was in an area of Dubai called Muhaisnah, which is located ten minutes from the Dubai international airport. Muhaisnah was not isolated and was home to many different families. In the 1990s, Muhaisnah was a residential community which then had approximately 100 homes. Muhaisnah had schools, clinics, department stores, and other businesses just like other communities in Dubai. I moved into my own home in Muhaisnah with my wife after we were married in 1998. I have never heard the term "Medinat al Lootah" used to refer to my Muhaisnah neighborhood or in any other context. My father never discouraged me from going to other places in Dubai, and I and my siblings regularly traveled throughout Dubai and throughout the world while we were growing up.

Saeed Ahmad Lootah

9. My father, Saeed Ahmad Lootah, focused his life on peaceful development and education. He was a key figure supporting the infrastructure and growth of Dubai.

10. My father passed away in June 2020. Because of my father's his enormous contributions to development and education, his death was publicized. True and correct copies of newspaper articles reporting his death are attached as Exhibit 1 to this declaration.

Dedication to Education and Charity

11. My father always encouraged me and my siblings (including my sisters) to pursue education, including higher education in the West. My father was very proud that my brother Saleh and I received degrees in the United States. My brother Saleh obtained his Master in Business Administration at Harvard University.

12. My father was a pioneer in the female education. All of my five sisters graduated from college. My father dedicated much of his professional life to the education of women.

a. In 1986, my father founded Dubai Medical College for Girls. It the first medical college in the UAE, and it has provided opportunities for women to pursue a medical education. Both Muslims and non-Muslims study at Dubai Medical College for Girls. The Dubai Medical College for Girls' first dean was a woman named Zahira Abdin. More than twenty of the college's graduates have gone on to work or teach in the United States. I have been the Vice Chairman of the Board of Trustees of the Dubai Medical College for Girls since approximately 2000.

b. In 1992, my father founded the Dubai Pharmacy College for Girls. The Dubai Pharmacy College for Girls was the first pharmaceutical institution in the UAE that allowed women to pursue a degree in pharmacology. I have served as Vice-Chairman of the Dubai Pharmacy College for Girls.



c. In 1990, my father established The Lootah Technical Center, which offers both men and women to opportunity to take courses in professional training and skills in fields such as engineering, electronics, electrical, and photography, and audio-video production. The Lootah Technical Center is within the SS Lootah Group, of which I am the Vice Chairman and CEO.

13. My father was also dedicated to improving the environment. In 1990, he founded the Dubai Institute for Environmental Research and Laboratory Analysis, which supported the study of the environment.

14. True and correct copies of pictures of my father working with delegations on educational issues are attached to this declaration as Exhibit 2.

15. My father also actively supported charitable causes supporting persons without regard to their religion or color. He established an orphanage in Dubai and brought orphans (beginning with orphans from Sri Lanka) to Dubai so that they could receive support and education during their childhoods.

The United States and the West

16. My father encouraged me and my siblings to travel the world and to the West, including to the United States.

17. Aside from attending Bridgeport University, I visited the United States more than ten times. For my honeymoon, I visited New York, Las Vegas, Miami, and Salt Lake City. My father paid for my honeymoon in the United States.

18. Other members of my family have also visited the United States, including for extended periods to seek medical treatment. I went with my brother, Yousuf Saeed Ahmad Lootah, when he went to receive medical treatment at Cleveland Hospital in 2012. In addition my uncle, Sultan Lootah, received medical treatment in Houston, Texas from September 2019 through July 2020.

19. One of my brothers has been regularly visiting the United States as he develops partnerships for our educational institutions.

20. My father enjoyed his travels to Europe. I recall that he traveled to the United Kingdom in approximately 1996 with the Deputy Ruler of Dubai.

21. I do not believe that Saeed Ahmad Lootah ever traveled to Sudan, Afghanistan, or Bosnia. He was not involved in the mujahideen in Afghanistan or Bosnia.

Dubai Islamic Bank

22. My father Saeed Ahmad Lootah founded Dubai Islamic Bank (DIB) in 1975. My father expressed to me his pride in having founded DIB, which was the first successful Islamic bank in the world. DIB provides banking services to customers consistent with the teachings of the Muslim faith, including by prohibiting the charging of interest.

23. I have served on the Board of Directors of DIB since 2011.

24. While I worked with my father in early and mid 1990s, my father was not involved in the day-to-day activities of DIB. At that point, DIB was an established bank and my father left it to the bank's management to run the bank on a daily basis.

25. Following the recapitalization of DIB by the Government of Dubai in 1998, my father ceased having any role or involvement in DIB.

Tolerance

26. I believe that Islam is a religion of peace, and that violence and extremism have no place in Islam. I believe that Muslims and non-Muslims should live together in peace. These beliefs were taught to me by my father from the time I was a young child and something that my father practiced every day.

27. My father believed that Christians, Jews, and Muslims all prayed to the same God. As a result, he was very tolerant of and respected other religions.



28. My father regularly hosted various groups of people in his home, including visitors from around the world and of many different religions. In addition, my father arranged for one of my professors from Bridgeport University (Professor Paul Bauer) to come to Dubai in 1999 to lecture on business quality issues.

29. Based upon my living and working with my father and my regular contact with him thereafter until his death, I always knew my father to be open minded and to promote religious tolerance. For example, his charitable giving and educational institutions were not limited to Muslims, but extended opportunities and help to people of many religious backgrounds, including Jews and Christians. My father's businesses employed Muslims and non-Muslims and both men and women.

Terrorism

30. At the time of the terrorist attacks on September 11, 2001, I was living in Dubai. I learned of the tragedy on the news. I was horrified by the attacks, which I believe were completely unacceptable and a crime against humanity.

31. I spoke to my father Saeed Ahmad Lootah shortly after the 9/11 and he expressed his shock and sadness about the attacks. My father strongly condemned the attacks as inhumane and a crime against humanity.

32. I have never heard and observed my father support terrorism of any kind. My father repeatedly emphasized peace and development. He vehemently opposed all forms of violence.

33. During my life, there was never any indication that my father knew Osama bin Ladin or had ever communicated with him, either directly or indirectly.

34. I am not aware of relationship between my father and al Qaeda, Osama bin Ladin, or Osama bin Ladin's businesses.

35. I have never heard my father express any positive views about al Qaeda or Osama bin Ladin.



Pursuant to 28 U.S.C. §1746, I, YAHYA SAEED AHMAD LOOTAH, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 13, 2022.

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke, positioned above a thin horizontal line.

EXHIBIT 1

Gulf Business

NOW READING

Haj Saeed bin Ahmed Al Lootah, founder of Dubai Islamic Bank, dies

Haj Saeed bin Ahmed Al Lootah, founder of Dubai Islamic Bank, dies

Sheikh Mohammed and Sheikh Hamdan paid tribute to the founder of the world's first Islamic bank



BY VARUN GODINHO
JUNE 29, 2020



Prominent Emirati businessman Haj Saeed bin Ahmed Al Lootah who founded the world's first Islamic bank, the Dubai Islamic Bank in 1975, died on Sunday, June 29.

Apart from establishing societies like the Dubai Consumer Cooperative, Al Lootah who was born in 1923, also established the S.S. Lootah Contracting Company, a joint venture with his brother Sultan in 1956.

Sheikh Mohammed bin Rashid Al Maktoum, Vice President and Prime Minister of the UAE and Ruler of Dubai, as well as Sheikh Hamdan bin Mohammed bin Rashid Al Maktoum, Crown Prince of Dubai and chairman of Dubai Executive Council, took to Twitter to express their condolences.

حط رحاله عند ربه اليوم الحاج سعيد أحمد آل لوتاه.. أنشأ أول بنك إسلامي في العالم، وكان تاجراً
عصامياً له بصماته في اقتصاد دبي.. له يد طويلة في الخير.. وهو أب للكثير من الأيتام .. عرفت فيه
عقلاً راجحاً وحكمة وسكينة.. رحمك الله.. وتقبل عملك .. وألهم أهلك الصبر والسلوان ..
pic.twitter.com/SOKzXI9meq

— HH Sheikh Mohammed (@HHShkMohd) June 28, 2020

"He was a self-made businessman who has had his imprints on Dubai's economy," said Sheikh Mohammed adding the Al Lootah was "best known for his philanthropic work and as a father of many orphans."

"I knew him as a rational and wise man. May Allah the Almighty rest your soul in peace and accept his deeds, and grant his family patience and solace," noted Sheikh Mohammed too.

In a similar tribute to Al Lootah, Sheikh Hamdan tweeted: "He established the world's first Islamic bank in 1975 and launched charitable educational institutions and left an exceptional footprint in sponsoring orphans that will remain immortal in the memory of many."


ودعنا اليوم الحاج سعيد أحمد آل لوتاه ... جمع بين الريادة الاقتصادية وأعمال الخير الجليلة. أسس
أول بنك إسلامي في العالم في عام 1975 وأطلق مؤسسات تعليمية خيرية وترك بصمة استثنائية
في كفالة الأيتام ستبقى خالدة في ذاكرة الكثيرين. رحمه الله، وألهم أهله وذويه الصبر والسلوان.
pic.twitter.com/3crtc82HOq

— Hamdan bin Mohammed (@HamdanMohammed) June 28, 2020

Gulf Today Beta

NEWS

Emirati philanthropist, banker and entrepreneur Saeed Lootah passes away

29 Jun 2020 | 



Saeed Bin Ahmed Al Lootah. File

Gulf Today, *Staff Reporter*

Emirati philanthropist, economist, banker, and entrepreneur Saeed Bin Ahmed Al Lootah passed away on Sunday.

His Highness Sheikh Mohammed Bin Rashid Al Maktoum, Vice President and Prime Minister of the UAE and Ruler of Dubai, on Sunday evening offered condolences to the Lootah family on the death of Saeed Ahmed Al Lootah, who passed away at the age of 97 on Sunday.

Sheikh Mohammed expressed his profound sorrow and solace to the family of Al Lootah on the death of Saeed Lootah, praying to Allah Almighty to rest him soul in paradise.



Sheikh Mohammed wrote on his Twitter account, "Today Haji Saeed Ahmed Lootah passed away. He was a self-made merchant who contributed significant achievements to the Dubai's economy, and was the one who established the world's first Islamic bank. His unlimited benevolence and giving for all never stopped. I knew in him wisdom and tranquillity. I pray to Allah Almighty have mercy on you... accept your deeds ... and inspire your family with patience and solace."

Saeed Bin Ahmed Al Lootah was born in Dubai in 1923, to a family interested in knowledge, trade and business.

Saeed Bin Ahmed Al Lootah was a self-made businessman who progressed from being a seafarer and trader, in his early days, to an accomplished tutor, author, economist, banker, entrepreneur, businessman and visionary community leader.



Saeed's zest for life and fervent adherence to the core values of education, cooperation and economy, powered an endless desire to 'make things better' by empowering people to excel at everything they did.

He realised the need to build permanent houses and ventured into construction.

His "capital" at that time was his skills, knowledge and hard work.

Saeed Lootah once said, "Business exists fundamentally to serve people."




Saeed Lootah laid the foundation of SS Lootah Contracting Company as a joint venture with his brother Sultan in 1956. With the enduring values of education, cooperation and economy set as the foundations of his work, Saeed Bin Ahmed Al Lootah started a number of businesses as well as not-for-profit education and research ventures, with an aim to serve the people of the United Arab Emirates.

SS Lootah Group said on its website, "Thanks to his vision and leadership our homegrown ventures continue to demonstrate unique values that extend well beyond its functional benefits creating greater economic, social and environmental benefits for people in the United Arab Emirates and beyond."

Gulf Today Beta

NEWS

Saeed Lootah never stopped giving, says Mohammed

29 Jun 2020 



Saeed Ahmed Bin Lootah with Sheikh Mohammed and Sheikh Hamdan. File

Eminent Emirati economist Saeed Ahmed Bin Lootah died on Sunday at the age of 97.

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Saeed Lootah with Sheikh Mohammed Bin Rashid. File

Sheikh Hamdan Bin Mohammed Bin Rashid Al Maktoum, Crown Prince of Dubai, said on Twitter, "Today, Saeed Ahmad Al Lootah left us... he combined economic leadership with great benevolence. He established the world's first Islamic bank in 1975 and launched charitable educational institutions and left an exceptional footprint in sponsoring orphans that will remain immortal in the memory of many. May Allah have mercy on him, and inspire his family with patience and solace."

Sheikh Ahmed Bin Mohammed Bin Rashid Al Maktoum, Chairman of Dubai Media Council, mourned the death of Saeed Lootah.

Sheikh Ahmed said on Twitter, "We extend our sincere condolences to the family of Saeed Ahmed Al Lootah ... His biography, economic leadership, and his charitable and humanitarian work will remain present in the hearts of many. We ask Allah to grant mercy on him. We belong to Allah and we shall return to Him..."



Sharjah Ruler Sheikh Sultan with Saeed Lootah. File

Saeed Bin Ahmed Lootah was born in Dubai in 1923, to a family interested in knowledge, trade and business. After completing his basic education in schools and other places, he moved to the field of working with his father in the midst of seas and deserts, to fulfil with him his ambitions and dreams, and to develop his personality in the councils of his father and family. The eminent UAE economist Saeed Lootah was the founder and chairman of the Saeed Ahmed Lootah and Sons Group, and the founder of Dubai Islamic Bank in 1975, which is the first Islamic bank in the world, and the Arab Islamic Insurance Company in 1979 and Chairman of the Supreme Council of the Al Lootah International University with Modern Communications.

He also established Dubai Medical College for Girls in 1986, and Dubai College of Pharmacy in 1992, and established the first consumer cooperative society in the UAE under the name Dubai Cooperative Society in 1972.

In the field of education, Saeed Lootah established the "Orphan Education Foundation" in 1982, and the "Islamic School of Education" in 1983, and he was also the founder of the first environmental research centre in Dubai in 1992.



Saeed Lootah supervises a construction work. File

Saeed Lootah participated in many Arab, Islamic and international scientific conferences and seminars in the field of Islamic economics and Islamic banks, and contributed to solving banking, administrative and financial problems in many Islamic financial institutions. He has written many books, including: "Why do we learn?", "Awtar and and Afkar" Hamasat from the rhymes of Nabati poetry", "What is Islam?", "Objectives from founding banks", "Reflections on Surat Al-Talaq", "Reflections on Surat Al-Ma'un, "Marriage in Islam is a Worship."

Saeed Lootah was awarded an honorary doctorate from the "University of Parkton" in the United States in 1999, and another honorary doctorate from the "International Academy for Informatics" in Russia in agreement with the United Nations in 2003, and was honoured by the Gulf Cooperation Council in recognition of his services in the field of education and economics in the region.

Saeed Lootah was awarded the title of First Economist in the UAE in 1999, and awarded the "Sheikh Hamdan Bin Rashid Al Maktoum Award for Medical Sciences" in 2004, the "President Merit Award" in 2011, and the "Economic Innovation Award" from the "Arab Thought Foundation" 2012.

Forbes Middle East ranked him among the "100 Most Rich Arabs in 2013" and he was honoured with the "Islamic Economy Award" from Sheikh Mohammed Bin Rashid Al Maktoum in 2015.

EXHIBIT 2



The external examination committee professors from the UK visiting the chairman after performing the exams for gynecology and obstetrics for the students at Dubai Medical College





Canadian Students Visiting the chairman

